

June 8, 2018

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Re: *Futreal v. Ringle*, Case No. 7:18-cv-29-FL (E.D.N.C.)

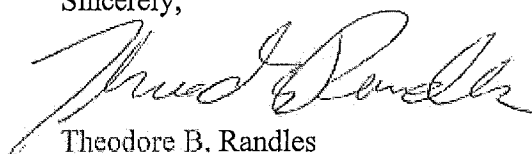
Michael:

I write in response to your June 7 letter. Notwithstanding your distress, Enterprise's written responses to Plaintiffs' first requests for production were served within the 60 day timeframe that the parties, including you, agreed to. It is unclear why you are upset by that. The responses were neither "woefully inadequate" nor do they amount to a "discovery violation" as you seem to believe.

As Enterprise made clear in its responses, Plaintiffs' requests were overbroad and requested numerous irrelevant documents. Those requests need to be narrowed to properly correspond to the needs of the case. While you are free to presume whatever you like, your presumption that Enterprise is delaying due to your client's age is incorrect. We are proceeding on the schedule agreed by the parties, and any delay is owing to the overbreadth of your discovery requests and the need to schedule meet and confers to address those requests.

I understand you have requested a meet and confer for Monday, June 11. As Doug Baldrige previously communicated to you when you scheduled Mr. Futreal's deposition, we are unavailable on that date. I will provide you a number of availabilities for a meet and confer following Mr. Futreal's deposition.

Sincerely,



Theodore B. Randles

EXHIBIT D